

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose: Compliance Evaluation Inspection

Facility: Benton Dairy, LLC

Ex. 6 (Personal Privacy)

NPDES Permit Number: None

Date of Inspection: April 28 and 29, 2021

EPA Representatives: Cheryl Burdett

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Ex. 6. (Personal Privacy)

Ex. 6. (Personal Privacy)

Scott Severson, Consultant for Benton Dairy, LLC

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Inspector Signature: Burdett, Cheryl

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Burdett, Cheryl
Date: 2021.06.28
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Approver Name and Title: Ryan Bahr, Section 2 Chief, Water Enforcement and Compliance Assurance Branch

Approver Signature and Date: RYAN BAHR

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1. **BACKGROUND**

The purpose of this report is to describe, evaluate and document Benton Dairy, LLC's (Benton Dairy) compliance with the Clean Water Act (CWA) at its Benton County, Indiana 47917-003 facility on April 28 and 29, 2021. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

Benton Dairy is a large dairy operation that confines 1440 mature milking and dry cows. 40 C.F.R (code of federal regulations) § 122.23(b)(4), defines a large concentrated animal feeding operation as an animal feeding operation that stables or confines as many or more than 700 mature milking or dry mature dairy cows. Benton Dairy does not have an NPDES permit. It is currently under an Indiana Department of Environmental Management Permit Farm ID Number 6367. It also has a permit from the Indiana State Chemist to market and distribute its manure.

Prudential Ditch is a perennial waterway to the west of Benton Dairy. Prudential Ditch flows to the North Vermillion River, a water of the United States which flows southwest into the Wabash River a traditional navigable waterway that is impaired for nutrients.

Ex. 6. (Personal Privacy) was notified via e-mail to announce the inspection at Benton Dairy located at Ex. 6 (Personal Privacy) on April 28, 2021. The inspection would include a walk-through of the facility production area. To minimize time on-site due to the COVID-19 pandemic, I shared that I would go through documents and the questions I needed to ask by conference call. I asked him what day would work for the call to go over questions about the facility and Ex. 6. (Personal Privacy) asked if we could go over the questions on April 29, 2021.

2. **SITE INSPECTION**

Table 1: Site Entry and Opening Conference

Arrival Time:	EPA arrived at Benton Dairy at approximately 9:55 a.m. on April 28, 2021.
Temperature:	The air temperature at Benton Dairy was approximately 55 degrees Fahrenheit and raining.
Precipitation:	It was raining at the time of the inspection but stopped during the inspection.
Presented credentials?	Yes.
Credentials presented to whom and at what time?	Cheryl Burdett and Ben Atkinson presented credentials at approximately 10:00 a.m. to Ex. 6. (Personal Privacy), the Owner and Scott Severson, the consultant.
Was an opening conference held? With whom? Yes. EPA presented credentials to Ex. 6. (Personal Privacy) and Scott Severson and explained the purpose of EPA's inspection was to document compliance with the Clean	

Water Act. Ex. 6. (Personal Privacy) stated that he is the owner of Benton Dairy. Scott Severson, Consultant accompanied us on the walk-through of Benton Dairy.	
If photographs or documents were taken, does the facility consider any to be Confidential Business Information (CBI)?	No
Which information does the facility consider to be CBI?	Not applicable
EPA vehicle parked in approved location?	Yes, Ex. 6. (Personal Privacy) confirmed that the EPA vehicles were parked in an approved location.
Location where EPA vehicle was parked?	EPA parked the government vehicle on the east side of the Office/ Milking Parlor.
Disposable boots worn?	Yes.
Other bio-security measures taken (state vet contacted, etc.):	EPA e-mailed the State Veterinarian prior to the inspection. The State Veterinarian replied back by e-mail on 4/27/2021 stating, "I'm not aware of any disease outbreaks or other animal health concerns around Brown County". EPA wore masks due to COVID-19.

2.1 Records Review (The following Records Review tables reflect information provided before the walk-through of the facility, unless otherwise noted.)

Table 2: Documents

Checklist(s) Used
R5 CAFO Inspection Checklist
Facility Documents Reviewed:
The documents reviewed are listed in Table 15 of this inspection report.

Table 3: Facility Description

Type of Animal	Number of Animals	Capacity	Type of Confinement
Dairy/Dry Mature Cows	4300	4400	Freestall Barns
Heifers (4 months – 2 years)	NA	NA	NA
Calves (2-4 months)	NA	NA	NA
Minimum Number of Animals in previous 5 years:			In the last 5 years, the minimum number of animals at Benton Dairy was approximately 3200 milking and dry cows.

Maximum Number of Animals in previous 5 years:	Benton Dairy is currently at its maximum number with 4300 milking and dry cows.
Number of Animals that are stabled/confined and/or fed/maintained for 45 days or more in previous 12 months:	4300 milking and dry cows.
Amount of Liquid Manure Generated per year:	Ex. 6. (Personal Privacy) on our April 29, 2021 conference call stated that he would send this information by e-mail. Ex. 6. Ex. 6. (Personal Privacy) sent records on May 21 and June 9, 2021, but it did not include the amount of liquid manure generated.
Amount of Solid Manure Generated per year:	Ex. 6. (Personal Privacy) on our April 29, 2021 conference call stated that he would send this information by e-mail. Ex. 6. Ex. 6. (Personal Privacy) sent records on May 21 and June 9, 2021, but it did not include the amount of solid manure generated.
Does the facility have an NPDES Permit?	No. Benton Dairy has a state Confined Feeding Operation Permit from IDEM.
SIC or NAICS code:	0221
CAFO Defined Reason	Size.
Do animals have direct access to WOUS?	No.
Are crops, vegetation, forage growth, or post-harvest residues sustained in the normal growing season over any portion of the lot or facility where animals are kept?	No.
What is the area (acres) of the production area?	Benton Dairy's production area includes a north and south site, which Ex. 6. Ex. 6. (Personal Privacy) stated was approximately 100 acres.
What is the area (acres) of the pasture?	Not applicable.
How many employees (not counting family members)?	Benton Dairy has 30 employees that are non-family members.
Other facilities under common ownership (name and address): Yes	
Two other facilities in Indiana: Green Willow, Earl Park, Indiana Warren Dairy, Williams Port, Indiana	

Table 4a: Livestock Waste Storage

Ex. 6. (Personal Privacy) stated during the April 29, 2021 call that the information would be submitted via e-mail. Table 4 is based on the emails received from Ex. 6. (Personal Privacy) on May 21, 2021 and again on and June 9, 2021 and from the April 29, 2021 conference call. Ex. 6. (Personal Privacy) provided the following information:

Name of Structure	Type of Structure	Storage Capacity	Date of Construction	Type of Liner	Depth Markers Present	Last Time Waste Removed	Amount of Waste Removed	Days of Storage
1 st Stage Lagoon	Manure Storage Pond	5,015,355 Gallons	A report titled "Facility Detail Information Report" was provided to EPA on May 21 and again June 9, 2021 by e-mail. In the report, it was documented that the 1 st Stage Lagoon was constructed in 2008.	Concrete Floor with clay lined berms.	Safety Marker and MOL marker	Fall 2020	No provided.	Not provided.
2 nd Stage Lagoon –	Manure Storage Pond	5,536,899 Gallons	A report titled "Facility Detail Information Report" was provided to EPA on May 21 and again June 9, 2021. In the report, it was documented that the 2nd Stage Lagoon was constructed in 2008.	Clay liner.	No Marker s.	Fall 2020	Not provided.	Not provided.
3 rd Stage Lagoon	Manure Storage Pond	21,699,004 Gallons	A report titled "Facility Detail Information Report" was provided to EPA on May 21 and again on June 9, 2021 by e-mail. In the report, it was documented that the 3rd Stage Lagoon was constructed in 2008.	Clay liner.	Safety Marker and MOL marker	Fall 2020	Not provided.	Not provided.
4 th Stage Lagoon	Manure Storage Pond	15,031,421 Gallons	A report titled "Facility Detail Information Report" was provided to EPA on May 21 and again on June 9, 2021 by e-mail. In the report, it was documented that the 4 th Stage Lagoon was constructed in 2011.	Clay liner.	Safety markers , MOL Marker s	Fall 2020	Not provided.	Not provided.
5 th Stage Lagoon	Manure Storage Pond	Not provided.	A report titled "Facility Detail Information Report" was provided to EPA on May 21 and again on June 9, 2021 by e-mail. In the report, it was documented that the 5 th Stage Lagoon was constructed in 2018.	Clay liner.	Safety Marker s and MOL Marker.	Fall 2020	Not provided.	Not provided.
Silage Leachate Collection Pond	Silage Leachate Pond	Not provided.	A report titled "Facility Detail Information Report" was provided to EPA on May 21 and again on June 9, 2021 by e-mail. In the report, it was documented that the Silage Leachate Collection Pond in 2018.	Clay liner.	Depth Marker s	Fall 2020	Not provided.	Not provided.
Solid and Stacking Pad	Sand and Manure Solid concrete Pad	Not provided.	A report titled the "Facility Detail Information Report" was provided to EPA on May 21 and again on June 9, 2021 by e-mail. In the report, it was documented that the Solid and Sand Stacking Pad was constructed in 2018.	Concrete pad.	Not applica ble.	Fall 2020	Not provided.	Not provided.

Table 4b: Livestock Waste Management (continued)

Records at site of storage structure design?	EPA went through this checklist virtually. EPA asked Ex. 6. (Personal Privacy) if he had records of the storage structure designs and he stated “yes”. EPA asked for the documents and Ex. 6. (Personal Privacy) agreed to provide the documents at a later date, which were provided to EPA on May 21, 2021.
Is manure stored for the short term? If yes, describe where it is stored, how it is drained and where it drains to.	According to Ex. 6. (Personal Privacy) there is no off-site storage and IDEM does not require a set amount of days of storage.
Are records kept of the level of manure in the storage structures?	According to Ex. 6. (Personal Privacy), IDEM does not require Benton Dairy to record freeboard levels. Benton Dairy does a weekly inspection of the lagoon. Documents from these inspections were provided to EPA on May 21, 2021 via e-mail.
When was the last time a storage structure was emptied, either partially or completely?	Ex. 6. (Personal Privacy) stated that some of the manure from the lagoons was partially emptied in the Fall of 2020.
What amount of manure or process wastewater was removed the last time the storage structure was emptied, either partially or completely?	Ex. 6. (Personal Privacy) stated that he does not keep the records of the amount of manure or process wastewater that is removed from the storage structures. However, he records the amount of manure and process wastewater that has been manifested to other farmers. Ex. 6. (Personal Privacy) stated that he would provide the manifested manure records on May 21, 2021.
Do the facility personnel inspect and keep records of all diversion devices?	Ex. 6. (Personal Privacy) said that the diversion devices are visually inspected daily as employees walk-around the facility. This inspection information is not recorded.
Do the facility personnel inspect and keep records of all impoundments?	Ex. 6. (Personal Privacy) stated that they keep a log of weekly inspections. The weekly inspection logs from 2021 were provided on May 21, 2021.
Do the facility personnel inspect and keep records of all the water lines?	Yes, Benton Dairy employees record information about the waterlines as they conduct their weekly inspections of the storage lagoons. Yes, Benton Dairy employees record information about the waterlines as they conduct their weekly inspections of the storage lagoons.
Do the facility personnel perform routine visual inspections and keep records of the production area?	Yes. EPA received CAFO SELF-INSPECTION LOGS on May 21, 2021 by e-mail. The logs include what was looked at each week and if corrections were needed or completed.
Does the waste storage system have a managed outfall or discharge point?	No.

Has the facility had any documented discharges of livestock waste to surface water in the past year?	Ex. 6. (Personal Privacy) stated that Benton Dairy has had no discharges in the past year.
Are there safety devices installed around any manure storage ponds? (Barriers at the end of manure push off platforms, fences around pond, signage.)	No safety measures around storage structures.

Table 5: Livestock Waste Management

Describe the way manure is collected and disposed of at the facility:	
Scraped and flushed to a trench (in the Facility Description submitted via e-mail on May 21, 2021 also known as the “flush flume line”) in each of the barns, which will then flow by gravity to the Sand Separation Lane. The process wastewater within the Sand Separation Lane is pumped to the 1 st Stage Lagoon. There are concrete overflows between each stage lagoon, which, as the lagoons reach the height of the concrete, the manure and process wastewater overflow to the next stage each time taking less solids.	
Describe the way used bedding is collected and disposed of at the facility:	
The used sand is recycled and reused as bedding.	
Are mortality records kept?	Yes. Ex. 6. (Personal Privacy) agreed to provide the Mortality Records via e-mail. The records were provided to EPA on May 21, 2021 and again on June 9, 2021.
Describe the way mortalities are managed at the facility:	
The mortalities are composted at Benton Dairy.	
What type of method is used to provide drinking water for the animals?	A float system is used in the drinkers in place for the cows.
Describe the way spilled drinking water is collected and disposed of at the facility:	
It is mixed with the manure and collected in the trenches in the Barns.	
Describe the way mist cooling water is collected and disposed of at the facility:	
All the freestall barns have misting systems, except in the cow maternity area.	
Describe how chemicals are stored and how used or spilled chemicals are collected and disposed of at the facility:	
Chemicals are stored on the west side of the building that includes the Milking Parlor and Office. The drains in the chemical storage areas connect to the Reception Pit between Barn 2 and Barn 3. Chemicals include detergents, acids, teat dips and formaldehyde. Approximately a week of chemicals are stored at one time in this area.	
Describe the way water that has been used to wash/flush barns is collected and disposed of at the facility:	
The 3 rd Stage Lagoon and the Recirculation Pit are used to flush out the barns and added to the trenches to keep the used sand, manure, and wastewater moving by gravity to the Concrete Sand Separation Lane.	
Describe where water comes from that is used to clean and/or flush. (Wells, city, etc.).	

The water used to flush the barns comes from the Recirculation Pit to the Northwest of the Milking Parlor between Barn 3 and Barn 2 and the 3 rd Stage Lagoon. The Milking Parlor is cleaned with water from the Plate Coolers.	
Describe the way feed is contained and how runoff from feed is collected and disposed of at the facility:	
Feed is stored in the concrete Feed Storage Area and in concrete bunkers. All runoff from the Feed Storage Area flows by gravity into manholes that have underground piping to the Silage Leachate Collection Pond.	
If a dairy, describe how process wastewater from the plate cooler water is collected and disposed of at the facility:	
The plate cooler water is used to clean the Milking Parlor and for drinking water and for the cows.	
If a dairy, describe how process wastewater from the cleaning of the milking parlor is collected and disposed of at the facility:	
The process wastewater from the cleaning of the Milking Parlor flows into the Recirculation Pit located northwest of the Milking Parlor between Barns 3 and Barn 2.	
If a dairy, describe how process wastewater from the cleaning of the milk tanks is disposed of at the facility:	
The process wastewater generated from the cleaning of the milk tanks goes into trucks and is taken immediately off-site.	
If a dairy, how many times per day are cows milked?	3 times per day.

Table 6: Land Application and Disposal of Manure and Process Wastewater

Does the facility perform and keep records of the manure testing?	Yes. Ex. 6. (Personal Privacy) keeps records of the solid manure and process wastewater analysis which is analyzed by A & L Great Lakes Laboratory.
When was the last time a sample was taken of the manure and/or process wastewater?	Ex. 6. (Personal Privacy) stated that the last time manure/process wastewater samples were collected was the Fall of 2020 from the lagoons and Silage Leachate Collection Pond.
Describe the process to take the manure and/or process wastewater sample.	Ex. 6. (Personal Privacy) stated that the liquid and solid samples are taken from an in-line port, from the application equipment, as the manure is being pumped out of the equipment.
Number of acres available for land application:	Ex. 6. (Personal Privacy) stated that they do not conduct land application and they do not have any fields to apply manure and/or process wastewater.
Are land application records kept?	According to Ex. 6. (Personal Privacy), the records they have for land application include the vendors' manifests and the volume and fertilizer value.
Who applies the manure and process wastewater to the fields?	According to Ex. 6. (Personal Privacy), the manure is manifested or distributed to other farmers.

Are weather conditions at time of application kept? (24 before – 24 after)	Not applicable because Benton Dairy does not apply the manure or own any fields for land application.
Does the facility perform and keep records of the soil testing?	Not applicable.
Is manure transferred off-site to another party?	It is manifested and distributed to other parties.
Are manure transfer records maintained?	Yes.
Do facility personnel perform periodic inspection of land application equipment?	Not applicable.

Table 7: Receiving Surface Waters

Describe the surface flow pathways:	
During the walk-through of the production area at Benton Dairy, Ex. 6. (Personal Privacy) explained and showed EPA how the production area is graded to have stormwater and contaminated flow drain to the Stormwater Pond.	
How many months out of the year is there flow in the nearest surface water pathway:	According to Ex. 6. (Personal Privacy), Prudential Ditch flows almost all year.
Are there any storm water pathways entering the facility?	Yes, stormwater enters the facility from the agricultural field to the south. Ex. 6. (Personal Privacy) explained the production area is graded to divert the stormwater from the field to the south to the roadside ditch.
Are there any clean water ponds on site?	No.
What is the name of the first waterway that is identified as a Traditional Navigable Water (TNW) for surface flow from the facility?	The Wabash River is a Traditional Navigable Waterway.
Is the surface water pathway nearest to the facility considered to be ephemeral, intermittent, or perennial?	The nearest waterway is Prudential Ditch, which is a water of the United States.
Has the surface water pathway nearest to the facility been assessed for water quality?	Is it not clear if Prudential Ditch has been assessed, but where Prudential Ditch flows into the North Fork of the Vermilion River has been assessed and is on the 303d list for nitrate/nitrogen and Fecal Coliform.

Table 8: Nutrient Management Plan

NMP on site?	The facility does not have a Nutrient Management Plan. Ex. 6. (Personal Privacy) provided documents by e-mail on May 21,
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	2021 to demonstrate how manure and process wastewater are handled from the facility.
Date NMP Submitted:	Not applicable because Benton Dairy manifests and distributes its manure.
Planner Name/Company:	Not applicable.
Date that the NMP was last updated:	Not applicable.
Storage Description:	On May 21, 2021, Ex. 6. (Personal Privacy) provided a document titled "Site Plan-As Permitted September 17, 2010" which are drawings of the existing and proposed storage structures.
Amount of Manure Generated:	This information was not provided during our conference call on April 29, 2021. It was also not provided in the documentation sent by Ex. 6. (Personal Privacy) on May 21, 2021 or June 9, 2021.
Capacity of Storage:	This information was provided to EPA by e-mail on May 21, 2021 and again on June 9, 2021 in the following documents: "Facility Descriptions" and "Site Plan – As Permitted on September 17, 2010."
Duration of Storage:	EPA did not locate this information in the documents provided by Ex. 6. (Personal Privacy) in the May 21, 2021 submittal.
Amount of Spreadable Land:	Ex. 6. (Personal Privacy) stated that he does not own land for land application of manure or process wastewater.
Mortality Management Plan:	The IDEM construction permit had language stating that the mortalities would be in the building marked E15 on the Farmstead Plan. However, during the walk-through, EPA observed and confirmed from Ex. 6. (Personal Privacy) that the mortalities are composted on the Solid and Sand Stacking Pad.
Clean Water Diversion System:	The Farmstead Site Plan provided to EPA on May 21, 2021 describes the direction of flow within the production area and around the production area at Benton Dairy.
Direct Contact Prevention Plan:	Ex. 6. (Personal Privacy) stated that all cows are kept in the barns and do not have access to waters of the United States.
Chemical Management Plan:	Ex. 6. (Personal Privacy) showed us during the walk-through where chemicals are kept and explained that the drains in the Chemical Storage Area will flow to the Sand Separation Lane.
Conservation Practices:	This is not applicable since Ex. 6. (Personal Privacy) stated the farm does not have land for land application and does not apply manure to fields.
Manure Testing Protocols:	Ex. 6. (Personal Privacy) stated during the conference call that they collect the sample as the manure and/or process wastewater is being pumped into the manure truck. The samples are taken to A&L Great Lakes Laboratory for analysis.
Soil Testing Protocols:	Ex. 6. (Personal Privacy) stated the farm does not land apply manure or have fields available for land application.

Land Application Protocols:	Not applicable.
Does the NMP reflect the current operational characteristics?	Ex. 6. (Personal Privacy) did not provide to EPA on May 21, 2021 a Nutrient Management Plan but provided the documents to reflect the current operations of the production area.
Are the number of acres owned/leased consistent with what is listed in the NMP?	Not applicable.

Table 9: Land Application Records (details of the records reviewed)

This section was deleted because Benton Dairy manifests and distributes all of its manure. It does not own any for fields for land application.

Table 10: Facility Records (details of the records reviewed)

Diversion devices:	The Farmstead Plan provided by Ex. 6. (Personal Privacy) on May 21, 2021 to EPA by e-mail shows how the land application field to the south flows to the north toward Benton Dairy. Benton Dairy is graded to have the water flow to the roadside ditch, so it does not enter Benton Dairy's production area.
Impoundments:	On May 21, 2021 and again on June 9, 2021, Ex. 6. (Personal Privacy) provided documents that describe proposed and existing process wastewater and manure storage structures.
Depth marker observations:	According Ex. 6. (Personal Privacy), this is not required by IDEM.
Water Lines:	The waterlines are inspected visually and information about the waterlines are recorded on the weekly CAFO SELF-INSPECTION RECORD required by IDEM's State CFO Permit ID #6367. Ex. 6. (Personal Privacy) emailed this information to EPA on May 21, 2021 and again on June 9, 2021.
Mortality handling:	On May 21, 2021 and again on June 9, 2021, Ex. 6. (Personal Privacy) provided an excel spreadsheet listing the number of dead animals each month for the previous 12 months.
Storage Structure Design:	All the storage structures have been built, but Ex. 6. (Personal Privacy) provided design drawings that show existing and proposed manure and process wastewater storage structures on May 21, 2021 and again on June 9, 2021.
Overflow records:	Mr. Boerman did not provide any overflow records but stated on the conference call on April 29, 2021 that they did not have any overflows.
Crop Yields:	Not Applicable.
Land Application Dates:	Not Applicable.
Weather Conditions at time of application (24 before-24 after):	Not Applicable.
Test Methods for Manure Testing:	Ex. 6. (Personal Privacy) provided a word document regarding the methods used for liquid manure analysis: moisture/solids - UW A3769 111.2; Total

	Kjeldahl Nitrogen - UW A3769 111.3.2; Ammonia N as Nitrogen - UW A3769 111.4.1; Nitrogen is calculated (did not provide the formula); and elements (did not specify) - UW A3769 111.6.3.
Test Methods for Soil Testing:	Not Applicable.
Manure Test Results:	Yes, Ex. 6. (Personal Privacy) takes manure samples annually. He provided documentation to EPA on May 21 and June 9, 2021.
Soil Test Results:	Not Applicable.
Calculations of N and P applied:	Not Applicable.
Application Methods:	Not Applicable.
Application Equipment Inspection Dates:	Not Applicable.

Table 11: NPDES Permit

Type of permit (General, individual)	Benton Dairy does not have an NPDES permit; only a state Confined Feeding Operation Permit. It also has a permit from the State Chemist for Manifesting and Distributing of manure.
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2.2 Walkthrough of the Facility

We arrived at the announced CAFO inspection at Benton Dairy at approximately 9:55 a.m. and donned our yellow rubber boots and face masks (which are required due to COVID-19). I showed my credential to Ex. 6. (Personal Privacy) and his consultant Mr. Severson. EPA, Illinois EPA, and Ex. 6. (Personal Privacy) and Mr. Severson started the walk-through on the east side of Milking Parlor/Office.

We began walking between Barn 2 and Barn 3 where I observed used bedding and feed pushed from the barns and from the sides of the barns. According to Ex. 6. (Personal Privacy), the stormwater that comes into contact with the used bedding, feed, and manure flows to the drainage tiles between each of the barns. The drainage tiles go under the East Access Road to the east side of the East Access Road and outlet into the East Drainage Channel (Photos 72 and 73). The East Drainage Channel flows, either by gravity to the Stormwater Pond, or to a depressional area at the northeast corner of the facility.

We continued to the north side of the Milking Parlor where we observed the Chemical Storage Area. The Chemical Storage Area held teat dip, formaldehyde, and other chemicals. EPA observed drains in the Chemical Storage Area, which Mr. Benton explained would drain into the Sand Separation Lane (Photos RIMG0067 and RIMG0070) if there was a leak or spill from the chemicals. We continued to walk between Barn 2 and Barn 3 to the Recirculation Pit. The Milking Parlor has a drain that collects manure and process wastewater. The drain flows by gravity into the Recirculation Pit (Photo RIMG0071).

We observed the inlet and outlet of the drainage tile between Barn 1 and Barn 2 that goes under the East Access Road and outlet into the East Drainage Channel on the east side of the East Access Road (as identified on Attachment B). We continued to walk to the north on the east side of the barns. Here we observed water flowing into the East Drainage Channel. Water from the East Drainage Channel flows by gravity to the northeast corner of the facility into a depressional area as described above (Photo RIMG0083). Based on EPA's aerial photo, this area had previously been used as a calf-hutch area. Mr. Severson stated that when calves are on-site, they are now housed on the Feed Storage Area.

EPA observed on the north side of Barn 5 that used bedding and feed had been pushed out the door (Photos RIMG0085 and RIMG0086). ^{Ex. 6. (Personal Privacy)} explained that when stormwater comes into contact with any track out on the north side, it surface flows by gravity into the Sand Separation Lane. We also observed the outlet into the Sand Separation Lane. The outlet is from the trenches that collect used bedding, manure, and process wastewater in the barns and flow by gravity into the Sand Separation Lane (Photo RIMG0087).

EPA continued walking west on the north side of the facility and observed solids pushed over the concrete wall of the Solid and Sand Stacking Pad. ^{Ex. 6. (Personal Privacy)} explained that any stormwater that comes into contact with the solids been pushed over the wall would flow to the Stormwater Pond (Photo RIMG0091). We walked on the Solid and Sand Stacking Pad to observe how the process wastewater is pumped into the 1st Stage Lagoon (Photos RIMG0095 and RIMG0096).

We continued to the west side of the barns on the West Access Road (Attachment B). EPA observed the Hay Storage Barn on the west side of the facility and observed used bedding, feed, and manure on the West Access Road tracked out of Barn 1. (Photos RIMG0098 and RIMG0099). ^{Ex. 6. (Personal Privacy)} stated that any stormwater that comes into contact with solids tracked out of Barns 1, 2, or 3 flows either into the tile inlets between these barns or surface flows east along the West Access Road to the Solid and Sand Stacking Pad. ^{Ex. 6. (Personal Privacy)} stated that when stormwater comes into contact with solids on the West Access Road west of the Barn 4 and Barn 5, it surface flows to the South Drainage Ditch (Attachment B) and into the Stormwater Pond (Photos RIMG0115, RIMG0116, and RIMG0117).

We continued our walk-through to the south side of the Stormwater Pond and observed leachate from the silage stored in the silage bunkers. Any leachate, stormwater, and/or stormwater that comes into contact with the feed in the bunkers flows either into the South Drainage Ditch (Attachment B) or along the South Access Road (Attachment B) and into the Stormwater Pond (Photos RIMG0119 through RIMG0128).

As we were walking on the south side of the Stormwater Pond, we observed approximately one hundred frogs/toads within the Stormwater Pond (Photos RIMG0129 through RIMG0132). We continued to the southwest side of the Stormwater Pond where we observed the tile outlet into the Stormwater Pond. Mr. Boerman explained that the

agricultural field to the south was tiled to flow into Prudential Ditch (Photos RIMG0135 and RIMG0136), but this tile has been plugged and is now tiled to flow into the Stormwater Pond (Photo RIMG0133). We observed an access ramp into the Stormwater Pond, which Ex. 6 (Personal Privacy) explained farmers use to access the Stormwater Pond for irrigating their crops (Photo RIMG0134).

We continued to the 5th Stage Lagoon to observe the berms. We observed vegetation that at first appeared to possibly be impacting the berm. Ex. 6 (Personal Privacy) and Mr. Severson showed that the vegetation was not rooted to the liner but was in the compost that was used as additional protection of the berms (Photo RIMG0139). The compost on the berms contained bones from the cows that were composted in the mortality pile (Photo RIMG0140).

We observed the concrete overflow between the 4th and 5th Stage Lagoon on the east side of the 5th Stage Lagoon (Photo RIMG0143). The concrete overflow works when the liquids reaches the height of the overflow, the liquids will gravity flow into the next stage lagoon, with less and less solids. We observed the depth marker within the 4th Stage Lagoon.

We continued to the west side of the 3rd Stage Lagoon and continued to observe the conditions of the berms of the 3rd Stage Lagoon. We continued to walk around the 3rd Stage Lagoon on the north side to a concrete access ramp. We walked to the east side of the 3rd State Lagoon and observed the concrete overflow. We continued to walk around the 2nd and 1st Stage Lagoons and observe their concrete overflows.

We observed the Silage Leachate Collection Pond. Stormwater that comes into contact with feed within the concrete Feed Storage Area is collected and flows to the Silage Leachate Collection Pond.

We observed a few of the manholes within the concrete Feed Storage Area and observed flow into the manholes. These manholes are connected to the Sileage Leachate Collection Pond.

After completing the walk-through on the west side, we went back to the east side of the facility to walk between Barn 5 and Barn 4. Again, we observed inlet pipes and outlets into the East Drainage Channel.

EPA completed the walk-through. We agreed that we were going to have the conference call to complete the records portion and go through the checklist on April 29, 2021 at approximately 1:35 p.m. Eastern Standard Time.

2.3 Walk-Through Closing Conference:

After completing the walk-through, I explained that I did not observe any discharges from the facility at this time.

I explained that I had the following concerns:

1. The drains within the Chemical Storage Area that lead to the Sand Separation Lane.
2. The use of compost that had the bones from the cows on the berms of the 5th Stage Lagoon.

A third concern was identified after review of the documents received on May 21 and June 9.

3. The Facility Detail Report submitted to EPA on May 21 and June 9 stated that mortalities are stored in building E15. During the inspection, EPA was told by Ex. 6. (Personal Privacy) and shown that the mortalities are composted on the Solid and Sand Stacking Pad.

Table 12: Closing Conference and Post Inspection

Were specific Areas of Concern discussed with facility personnel?	Yes, 1 and 2 above were discussed with Mr. Boerman and his consultant.
Who were the Areas of Concern discussed with?	Ex. 6. (Personal Privacy) , Owner and Mr. Severson, Consultant.
Were any deficiencies or areas of concern addressed or fixed during the inspection? If so, list what was done. No.	
Compliance assistance materials given to facility personnel: Business Card was provided, but no compliance assistance information.	
Exit Time:	Approximately 1:45 p.m.
Disposable Boots Left at Facility?	Yes.
Vehicle Washed after leaving facility?	No.
Date that vehicle was washed:	May 5, 2021.

Table 13: Waterway Documentation

List the pathway taken by EPA inspectors to document the waterway at the facility.
EPA documented that there was flow in Prudential Ditch and confirmed with Ex. 6. (P) that it has flow almost all year.

Table 14: Sampling Information

Were samples taken?	No.
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Table 15: Documents submitted by Mr. Boerman on May 21, 2021.

Ex. 6. (Personal Privacy)

submitted the documents again on June 9, 2021.

1. Solid Manifest.pdf
2. Liquid Manifest.pdf
3. Manure Storage.pdf
4. Self Inspect.pdf
5. May 18, 2010 Designs from IDEM.pdf
6. Benton Dairy July 23 2020 IDEM CAFO Permit
7. Facility Details from July 23 2020 IDEM Permit
8. Grading Plan 2 of 2 Oct 21 2011.pdf
9. Design right side Drawing Dec 17 2010.pdf
10. Design left side Drawing Dec 17 2010.pdf
11. Benton Dairy Concrete Designs from 2020 IDEM Permit.pdf
12. Aug 25 2017 Pond Designs.pdf
13. Grading Plan 1 of 2 Oct 21 2011.pdf
14. Benton Dairy Manure Management Plan from 2020 IDEM Permit.pdf
15. Benton Dairy Marketing and Distribution Information from 2020 IDEM Permit. pdf
16. Liquid Manure Test Method.docx
17. Manifest Sum.pdf
18. Ambia Mortality.xlsx
19. Solid Distribution.pdf

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0066

Description: In front of the Milking Parlor, where EPA and IDEM parked their vehicles.

Location: East side of the office and Milking Parlor.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021/ 10:02 a.m.



Photo Number: RIMG0067

Description: The Chemical Storage Area has drains that convey flow to the Recirculation Pit between Barns 2 and 3.

Location: North side of the office/Milking Parlor between Barn 3 and Barn 2.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 10:17 a.m.



Photo Number: RIMG0068

Description: The noncontact cooling water tanks used to clean the Milking Parlor and provide water to the cows.

Location: North side of the office/Milking Parlor between Barn 2 and Barn 3.

Ex. 6 (Personal Privacy)

Facing: Southwest.

Date/Time: 4/28/2021/ 10:17 a.m.

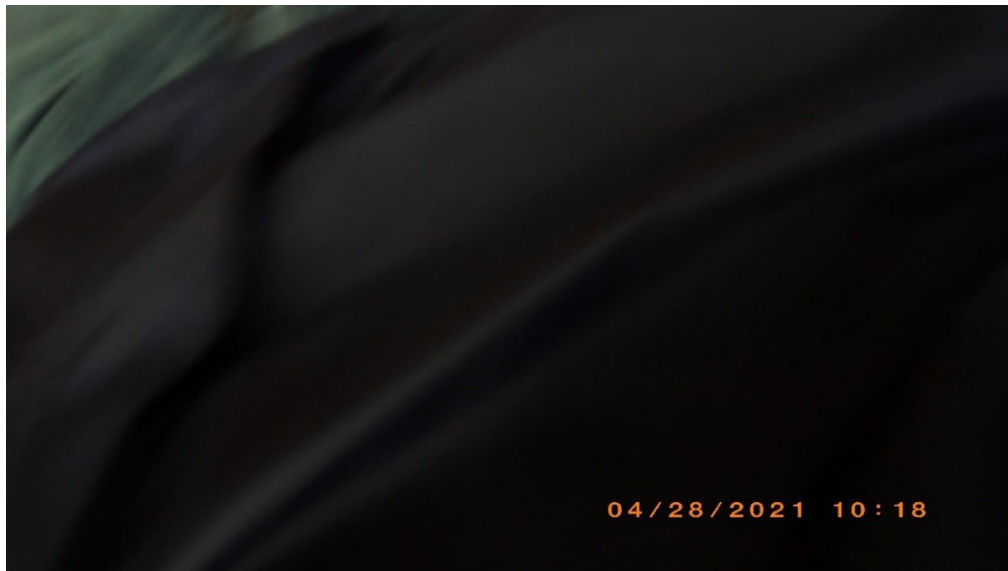


Photo Number: RIMG0069

Description: Accidental photo

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4

Location: Ex. 6 (Personal Privacy)

Facing: Cannot be determined.

Date/Time: 4/28/2021/ 10:18 a.m.



Photo Number: RIMG0070

Description: A second chemical storage Area with drains inside the building that convey any spill to the Recirculation Pit between Barns 2 and 3.

Location: The west side of the other chemical storage in photo RIMG0069.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 10:18 a.m.



Photo Number: RIMG0071

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4

Description: Recirculation Pit. Process wastewater from the clean out of the Milking Parlor gravity flows into the Recirculation Pit. The water within the Recirculation Pit is used to clean out the holding area for the cows.

Location: On the east side of the barns, between Barn 3 and Barn 2.

Ex. 6 (Personal Privacy)

Facing: Southwest.

Date/Time: 4/28/2021/ 10:20 a.m.



Photo Number: RIMG0072

Description: Flow from between Barn 3 and Barn 2 flows to the east. Bedding from Barn 2 is pushed out of Barn 2 on the south side of the Barn 2. The red outlined box shows the bedding pushed out of Barn 2.

Location: On the west side between Barn 3 and 2.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 10:28 a.m.



Photo Number: RIMG0073

Description: Barn 2 had some used bedding that was outside the doors on the east side of the barn and mixed with stormwater. The stormwater flows into drainage tile inlets between the Barns and outlets into the East Drainage Channel.

Location: Southeast of Barn 2 on the East Access Road.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021/ 10:30 a.m.



Photo Number: RIMG0074

Description: Drainage tile inlet between Barn 2 and Barn 3.

Location: On the east side of the Barns between Barn 2 and Barn 3.

Ex. 6 (Personal Privacy)

Facing: West.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4

Date/Time: 4/28/2021/ 10:31 a.m.



Photo Number: RIMG0075

Description: The drainage tile inlets collect the water between the barns and convey flow under the East Access Road into the East Drainage Channel identified above. The water within this East Drainage Channel will flow to the Stormwater Pond.

Location: East of Barns 1-5.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 10:32 a.m.



Photo Number: RIMG0076

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4

Description: The drainage tile outlets the flow collected from between Barn 2 and Barn 3 through the drainage tile between Barn 2 and Barn 3 and conveys flow under the East Access Road into the East Drainage Channel.

Location: The east side of East Access Road.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021/ 10:32 a.m.



Photo Number: RIMG0077

Description: The drainage tile outlets into the East Drainage Channel.

Location: The east side of the East Access Road.

Ex. 6 (Personal Privacy)

Facing: North

Date/Time: 4/28/2021/ 10:32 a.m.



Photo Number: RIMG0078

Description: Used bedding that came out of Barn 2.

Location: Northeast of Barn 2 on the East Access Road.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021/ 10:37 a.m.



Photo Number: RIMG0079

Description: The drainage tile inlet that collects the flow from between Barn 2 and Barn 1. The drainage tile conveys flow under the East Access Road into the East Drainage Channel.

Location: On the east side of the barns, between Barn 2 and Barn 1.

Ex. 6 (Personal Privacy)

Facing: Down.

Date/Time: 4/28/2021/ 10:43 a.m.



Photo Number: RIMG0080

Description: The drainage tile inlet between Barn 2 and Barn 1 that conveys flow under the East Access Road.

Location: On the east side of the barns, between Barn 2 and Barn 1.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 10:43 a.m.



Photo Number: RIMG0081

Description: Looking between Barn 2 and Barn 1.

Location: On the East Access Road east of Barn 1.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 10:43 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0082

Description: Used bedding pushed out of Barn 1 on the east side of Barn 1.

Location: On the East Access Road southeast of Barn 1.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021/ 10:43 a.m.



Photo Number: RIMG0083

Description: Depressional area north of Barn 1, previously where the calf hutch areas were located, but have been removed.

Location: The northwest corner of Barn 1.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 10:44 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0084

Description: On the north side of Barn 1. The East Drainage Channel conveys flow to the north side of Barn 1, which eventually ends up in the Stormwater Pond.

Location: Northwest corner of Barn 1.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 10:50 a.m.



Photo Number: RIMG0085

Description: Used bedding pushed out of the door of Barn 1.

Location: Northside of Barn 1.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 10:56 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0086

Description: Used bedding and feed pushed out of Barn 1, the Sand Separation Lane and Solid and Sand Stacking Pad which are labeled in the photo above.

Location: North of Barn 1
Ex. 6 (Personal Privacy)

Facing: North

Date/Time: 4/28/2021/ 11:01 a.m.



Photo Number: RIMG0087

Description: All the used bedding, manure, and process wastewater from Barns 1-5 is flushed with process wastewater from the Recirculation Pit and the 3rd Stage Lagoon and flows by gravity in the trench into the Sand Separation Lane.

Location: North of Barn 1
Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 11:01 a.m.

Benton Dairy, LLC

Ambia, Indiana

Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.

Camera Type: Olympus TG-4



Photo Number: RIMG0088

Description: The Sand Separation Lane and to the north is the Solid and Sand Stacking Pad labeled in the photo above.

Location: North of Barn 1 and Sand Separation Lane.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:01 a.m.



Photo Number: RIMG0089

Description: The green grass area is a depressional area where a part of the the East Drainage Channel flows into.

Location: North of Barn 1 on the North Access Road.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:03 a.m.



Photo Number: RIMG0090

Description: Barn 1, Sand Separation Lane, and Solid and Sand Stacking Pad.

Location: On the North Access Road.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 11:04 a.m.



Photo Number: RIMG0091

Description: In the red outline box in the photo above, some solids from the Solid and Sand Stacking Pad spilled over the concrete wall onto the North Access Road.

Location: On the north perimeter access road.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:08 a.m.



Photo Number: RIMG0092

Description: The pump used to pump liquid from the Solid and Sand Stacking Pad into the 1st Stage Lagoon.

Location: On the North Access Road on the north side of the Solid and Sand Stacking Pad.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 11:08 a.m.



Photo Number: RIMG0093

Description: The hose and pump used to pump liquids from Solid and Sand Stacking Pad into the 1st Stage Lagoon.

Location: Northwest corner of the Solid and Sand Stacking Pad.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:09 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0094

Description: Solid and Sand Stacking Pad.

Location: West side of the Solid and Sand Stacking Pad.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:09 a.m.



Photo Number: RIMG0095

Description: Sand Separation Lane which is pumped into the 1st Stage Lagoon.

Location: In the Solid and Sand Stacking Pad area west of the Sand Separation Lane.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:11 a.m.



Photo Number: RIMG0096

Description: This is where the process wastewater from the Sand Separation Lane is pumped to the 1st Stage Lagoon.

Location: On the northwest side of Barn 1.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 11:13 a.m.



Photo Number: RIMG0097

Description: Any process wastewater on the West Access Road flows into the Stormwater Pond. The Hay Storage Barn is labeled in the photo along with the West Access Road.

Location: West of Barn 1 and Barn 2.

Ex. 6 (Personal Privacy)

Facing: Southwest.

Date/Time: 4/28/2021/ 11:14 a.m.



Photo Number: RIMG0098

Description: The drainage channel between Barn 1 and Barn 2 is labeled with the arrow showing the direction of flow. The flow within the drainage channel conveys flow to a drainage inlet pipe that conveys flow to the Stormwater Pond.

Location: On the west side of Barn 1 and Barn 2 looking between the Barns.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:16 a.m.



Photo Number: RIMG0099

Description: The drainage tile inlet between Barn 1 and Barn 2.

Location: On west side of Barn 1 and Barn 2.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:18 a.m.



Photo Number: RIMG0100

Description: The overall view of the West Access Road. Flow is to the south (as shown in the photo by the red arrow) into a drainage tile that conveys flow to the Stormwater pond.

Location: On the north side of the West Access Road. West of Barn 1 and Barn 2.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 11:18 a.m.



Photo Number: RIMG0101

Description: On the West Access Road between the Hay Storage Barn and Barn 2.

Location: On the east side of the Hay Storage Barn and west of Barn 2.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021/ 11:19 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0102

Description: Used bedding and feed on the West Access Road between Barn 1 and Barn 2.

Location: On the West Access Road west of the Barn 1.

Ex. 6 (Personal Privacy)

Facing: Southeast.

Date/Time: 4/28/2021/ 11:19 a.m.



Photo Number: RIMG0103

Description: The drainage tile inlet between Barn 2 and Barn 3 on the west side of the Barns. The drain tile conveys flow between the barns to the Stormwater Pond.

Location: Between Barn 2 and Barn 3 on the west side of the barns.

Ex. 6 (Personal Privacy)

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4

Facing: East.

Date/Time: 4/28/2021/ 11:20 a.m.



Photo Number: RIMG0104

Description: The red arrow in the photo above shows the direction of flow within the drainage pathway between Barn 2 and Barn 3.

Location: Between Barn 2 and Barn 3 on the west side of the Barns.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:21 a.m.



Photo Number: RIMG0105

Description: The feed and used bedding pushed out of the Barn 2 and Barn 1 and drains to the southwest and drains to Stormwater Pond through tile inlets. One of the tile inlets is in the red box.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 11:21 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0106

Description: Stormwater mixed with used bedding and manure from Barns 1, 2, and 3 and feed on the West Access Road sloped to the southeast to drain into the tile inlet identified in the red outlined box.

Location: On the West Access Road east of the Concrete Feed Storage Area.

Ex. 6 (Personal Privacy)

Facing: At the northeast corner of the silage bunker.

Date/Time: 4/28/2021/ 11:24 a.m.



Photo Number: RIMG0107

Description: The concrete Feed Storage Area.

Location: East side of the feed storage area west of Barn 3.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:24 a.m.



Photo Number: RIMG0108

Description: Looking between Barn 2 and Barn 3. Used bedding pushed out of the south side of Barn 3 shown in the red outlined box in the photo above.

Location: Southwest corner of Barn 2.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:25 a.m.



Photo Number: RIMG0109

Description: The drainage tile inlet near the northwest corner of Barn 3 and used bedding being pushed out of Barn 3 shown inside the red outlined boxes in the photo above.

Location: Northwest corner of Barn 3, between Barn 2 and Barn 3.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 11:25 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0110

Description: Looking back to the north to observe the flow on the West Access Road.

Location: On the West Access Road between Barn 5 and the concrete Feed Storage Area.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:26 a.m.



Photo Number: RIMG0111

Description: Looking between Barn 4 and Barn 5.

Location: On the West Access Road between Barn 4 and Barn 5.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:27 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0112

Description: The drainage tile inlet between Barn 4 and Barn 5 on the west side of Barns.

Location: Between Barn 4 and Barn 5 on the west side of the Barns.

Ex. 6 (Personal Privacy)

Facing: Down

Date/Time: 4/28/2021/ 11:27 a.m.



Photo Number: RIMG0113

Description: The drainage tile Inlet between Barn 4 and Barn 5.

Location: On the West Access Road between Barn 4 and Barn 5.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:29 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0114

Description: The drainage tile Inlet location between Barn 4 and Barn 5.

Location: At the southwest corner of Barn 4.

Ex. 6 (Personal Privacy)

Facing: Southeast.

Date/Time: 4/28/2021/ 11:29 a.m.



Photo Number: RIMG0115

Description: Used feed and bedding coming out of the doors on the west side of Barn 5 flows west into the Stormwater Pond.

Location: At the northwest corner of Barn 4.

Ex. 6 (Personal Privacy)

Facing: Southeast.

Date/Time: 4/28/2021/ 11:30 a.m.



Photo Number: RIMG0116

Description: On the South Access Road on the south side of Barn 5.

Location: Southwest corner of Barn 5 on the South Access Road.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 11:33 a.m.



Photo Number: RIMG0117

Description: Observing the direction of flow on the west side of Barns 5 through 4, which is to the southwest.

Location: On the South Access Road at the southwest corner of Barn 5.

Facing: Northeast

Date/Time: 4/28/2021/11:33 a.m.



Photo Number: RIMG0118

Description: The South Drainage ditch surface flows to the west into the Stormwater Pond.

Location: On the South Access Road on the south side of Barn 5.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:35 a.m.



Photo Number: RIMG0119

Description: Feed exposed on the ground outside of the Silage Bunkers.

Location: On the South Access Road south of the Silage Bunkers.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:36 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0120

Description: High grains stored in the concrete Feed storage Area that drain to the manholes that drain to the Silage Leachate Collection Pond.

Location: On the South Access Road south of the Silage Bunkers.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021 11:38 a.m.

Ex. 6. (Personal Privacy)

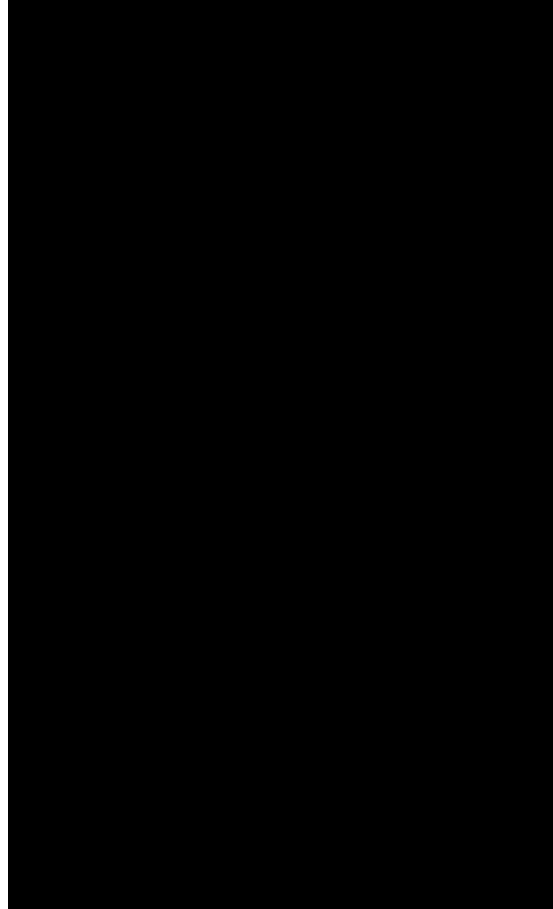


Photo Number: RIMG0121
Description: Accidental photo
Location: Ex. 6 (Personal Privacy)
Facing: South.
Date/Time: 4/28/2021/ 11:40 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0122

Description: Process wastewater drains to the west into the Stormwater Pond.

Location: On the South Access Road south of the Silage Bunkers.

Ex. 6 (Personal Privacy)

Facing: Northeast.

Date/Time: 4/28/2021/ 11:44 a.m.



Photo Number: RIMG0123

Description: The process wastewater coming off of the silage stored in the Silage Bunkers flows to the west into the Stormwater Pond.

Location: On the south side of the Silage Bunkers on the South Access Road.

Ex. 6 (Personal Privacy)

Facing: Northeast.

Date/Time: 4/28/2021/ 11:44 a.m.



Photo Number: RIMG0124

Description: The process wastewater flowing to the south into the Stormwater Pond.

Location: On the South Access Road on the southwest corner of the Silage Bunkers.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:44 a.m.



Photo Number: RIMG0125

Description: The feed outside of the Storage Bunkers, which mixes with stormwater and flows into the Stormwater Pond.

Location: On the southwest corner of the South Access Road and the West Access Road.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:47 a.m.



Photo Number: RIMG0126

Description: The eroded drainage channel that flows into the Stormwater Pond.

Location: On the east side of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:48 a.m.



Photo Number: RIMG0127

Description: The continuation of the eroded drainage channel that carries flow into the Stormwater Pond.

Location: East side of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 11:48 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0128

Description: The eroded channel carries flow into the Stormwater Pond.

Location: Southeast corner of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: Northwest

Date/Time: 4/28/2021/ 11:49 a.m.



Photo Number: RIMG0129

Description: Observed hundreds of frogs in the Stormwater Pond.

Location: Close-up of the frog within the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: Down.

Date/Time: 4/28/2021/ 11:56 a.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0130

Description: There were hundreds of frogs within the Stormwater Pond.

Location: Southside of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 12:02 p.m.



Photo Number: RIMG0131

Description: Trying to show the frogs within the Stormwater Pond.

Location: Southside of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: Down.

Date/Time: 4/28/2021/ 12:03 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0132

Description: Again, frogs within the Stormwater Pond.

Location: Southside of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021/ 12:03 p.m.



Photo Number: RIMG0133

Description: Tile outlet from the agricultural field drains into the Stormwater Pond.

Location: Southside of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 12:04 p.m.



Photo Number: RIMG0134

Description: Access area to pump out the Stormwater Pond.

Location: Southside of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 12:07 p.m.



Photo Number: RIMG0135

Description: The drainage tile outlet into Prudential Ditch was plugged. The drainage has been rerouted into the Stormwater Pond.

Location: West of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 12:09 p.m.



Photo Number: RIMG0136

Description: The close-up of the tile outlet into Prudential Ditch that has been plugged and rerouted to drain into the Stormwater Pond.

Location: West of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021/ 12:09 p.m.



Photo Number: RIMG0137

Description: The erosion channel into Prudential Ditch, west of the Stormwater Pond.

Location: West of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 12:11 p.m



Photo Number: RIMG0138

Description: The flow drains from the north to the south into the Stormwater Pond.

Location: Northwest corner of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: Southeast.

Date/Time: 4/28/2021/ 12:16 p.m.



Photo Number: RIMG0139

Description: The west berm of the 5th Stage Lagoon.

Location: Southwest corner berm of the 5th Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021/ 12:22 p.m.



Photo Number: RIMG0140

Description: Mortality compost is used on top of the clay liner of the 5th Stage Lagoon. In the red outlined box, there are white cow bones.

Location: On the berm between the 5th Stage Lagoon and the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 12:22 p.m.



Photo Number: RIMG0141

Description: The east berm of the Stormwater Pond.

Location: On the berm between the 5th Stage Lagoon and the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021/ 12:31 p.m.



Photo Number: RIMG0142

Description: The north berm of the 5th Stage Lagoon.

Location: On the north side of the 5th Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 12:31 p.m.



Photo Number: RIMG0143

Description: The concrete overflow that conveys process wastewater from the 4th Stage Lagoon into the 5th Stage Lagoon.

Location: On the berm between the 5th Stage Lagoon and 4th Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021/ 12:33 p.m.



Photo Number: RIMG0144

Description: The concrete overflow between the 4th Stage Lagoon and the 5th Stage Lagoon.

Location: On the berm between the 5th Stage Lagoon and 4th Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 12:33 p.m.



Photo Number: RIMG0145

Description: Looking at the west and the south berms on the 4th Stage Lagoon.

Location: On the berm between the 4th and 5th Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 12:34 p.m.



Photo Number: RIMG0146

Description: The west and north berms of the 4th Stage Lagoon

Location: On the berm between the 4th and 5th Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021/ 12:34 p.m.



Photo Number: RIMG0147

Description: The concrete overflow from the 3rd Stage Lagoon into the 4th Stage Lagoon.

Location: On the northwest corner of the 4th Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 12:37 p.m.



Photo Number: RIMG0148

Description: The concrete overflow that conveys wastewater from the 3rd Stage Lagoon to the 4th Stage Lagoon.

Location: On the west side of the center berm between the 3rd Stage and 4th Stage Lagoons.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021/ 12:37 p.m.



Photo Number: RIMG0149

Description: The 3rd Stage Lagoon.

Location: On the southwest corner of the 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021 12:38 p.m.



Photo Number: RIMG0150

Description: The concrete overflow from between the 2nd Stage Lagoon and the 3rd Stage Lagoon.

Location: On the berm between the 2nd and 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021 12:38 p.m.



Photo Number: RIMG0151

Description: The concrete overflow from between the 3rd and 2nd Stage Lagoon.

Location: On the berm between the 3rd and 2nd Stage Lagoons.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:38 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0152

Description: The north berm of the 3rd Stage Lagoon.

Location: On the north side of the 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:41 p.m.



Photo Number: RIMG0153

Description: The north berm of the 3rd Stage Lagoon.

Location: On the northwest corner of the 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021 12:41 p.m.



Photo Number: RIMG0154

Description: Access pad to the 3rd Stage Lagoon.

Location: North side of the 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:44 p.m.



Photo Number: RIMG0155

Description: North berm of the 3rd Stage Lagoon.

Location: On the northeast corner of the 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:45 p.m.



Photo Number: RIMG0156

Description: The concrete overflow from the 2nd Stage Lagoon into the 3rd Stage Lagoon.

Location: On the berm between the 2nd and 3rd Stage Lagoons.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:46 p.m.



Photo Number: RIMG0157

Description: The depth marker within the 3rd Stage Lagoon.

Location: On the berm between the 2nd and 3rd Stage Lagoons.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:46 p.m.



Photo Number: RIMG0158

Description: The depth marker within the 2nd Stage Lagoon.

Location: On the berm between the 2nd and 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: Down.

Date/Time: 4/28/2021 12:46 p.m.



Photo Number: RIMG0159

Description: Berm between the 1st and 2nd Stage Lagoons.

Location: On the berm between the 2nd and 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:49 p.m.



Photo Number: RIMG0160

Description: The pump within the 1st Stage Lagoon.

Location: On the southeast corner of the 2nd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021 12:50 p.m.



Photo Number: RIMG0161

Description: The concrete overflow from the 1st Stage Lagoon into the 3rd Stage Lagoon.

Location: Between the 1st Stage Lagoon and the 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 12:52 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0162

Description: The concrete overflow from the 1st Stage Lagoon into the 3rd Stage Lagoon.

Location: Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021 12:52 p.m.



Photo Number: RIMG0163

Description: Silage Leachate Collection Pond for the collection of the leachate from the Concrete Feed Storage Area.

Location: On the southwest corner of the 1st Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: Southwest

Date/Time: 4/28/2021 12:53 p.m.



Photo Number: RIMG0164

Description: The concrete conveyance from the concrete feed storage area into the Silage Leachate Collection Pond.

Location: South side of the 1st Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: Southeast.

Date/Time: 4/28/2021 12:53 p.m.



Photo Number: RIMG0165

Description: Close-up of the concrete conveyance from the concrete Feed Storage Area into the Silage Leachate Collection Pond.

Location: Ex. 6 (Personal Privacy)

Facing: South

Date/Time: 4/28/2021 12:53 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0166

Description: The aerator or pump within the 3rd Stage Lagoon.

Location: North side of the Silage Leachate Collection Pond and the 3rd Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021 12:55 p.m.



Photo Number: RIMG0167

Description: Silage Leachate Collection Pond.

Location: Southwest corner of the Silage Leachate Collection Pond.

Ex. 6 (Personal Privacy)

Facing: Northeast.

Date/Time: 4/28/2021 12:58 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0168

Description: The perimeter tile pump into the Stormwater Pond.

Location: West of the concrete Feed Storage Area and east of the Silage Leachate Collection Pond.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021 12:59 p.m.



Photo Number: RIMG0169

Description: The perimeter tile pump into the Stormwater Pond.

Location: West of the concrete Feed Storage Area and east of the Silage Leachate Collection Pond.

Ex. 6 (Personal Privacy)

Facing: Down.

Date/Time: 4/28/2021 1:00 p.m.



Photo Number: RIMG0170

Description: The perimeter tile pump into the Stormwater Pond.

Location: West of the concrete Feed Storage Area and east of the Silage Leachate Collection Pond.

Ex. 6 (Personal Privacy)

Facing: Down.

Date/Time: 4/28/2021 1:00 p.m.



Photo Number: RIMG0171

Description: An eroded channel that conveys surface flow into the Stormwater Pond.

Location: East side of the Stormwater Pond.

Ex. 6 (Personal Privacy)

Facing: Down and to the west.

Date/Time: 4/28/2021 1:01 p.m.



Photo Number: RIMG0172

Description: The commodity shed on the northwest side of the concrete Feed Storage Area.

Location: Northwest side of the concrete Feed Storage Area.

Ex. 6 (Personal Privacy)

Facing: North

Date/Time: 4/28/2021 1:05 p.m.



Photo Number: RIMG0173

Description: Concrete Feed Storage Area.

Location: West side of the concrete Feed Storage Area.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021 1:05 p.m.



Photo Number: RIMG0174

Description: The concrete Feed Storage Area.

Location: In the center on the west side of the concrete Feed Storage Area.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 1:06 p.m.



Photo Number: RIMG0175

Description: The manhole on the concrete Feed Storage Area that conveys flow to the Silage Leachate Collection Pond.

Location: On the northwest side of the concrete Feed Storage Area.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021 1:07 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0176

Description: The 1st Stage Lagoon and Commodity Shed.

Location: Southwest corner of the Commodity Shed.

Ex. 6 (Personal Privacy)

Facing: North.

Date/Time: 4/28/2021 1:11 p.m.



Photo Number: RIMG0176

Description: The pump to the 1st Stage Lagoon from the Sand Separator and drains flow to the Stormwater Pond.

Location: West of Feed Storage Area and south of commodity shed.

Ex. 6 (Personal Privacy)

Facing: Southeast.

Date/Time: 4/28/2021 1:12 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0178

Description: The depth gage for the 1st Stage Lagoon.

Location: On the east side of the 1st Stage Lagoon.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 10:14 a.m.



Photo Number: RIMG0179

Description: The drain pipe between Barn 4 and Barn 5.

Location: West side of Barn 4 and Barn 5 at the southwest corner of Barn 4.

Ex. 6 (Personal Privacy)

Facing: Northeast.

Date/Time: 4/28/2021 1:23 p.m.



Photo Number: RIMG0180

Description: The drainage tile inlet between Barn 4 and Barn 5 on the east side of the barns.

Location: On the east side of the facility between Barn 4 and Barn 5.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 1:25 p.m.



Photo Number: RIMG0181

Description: Stormwater that comes into contact with used bedding and feed pushed out of Barn 4 flows to the north and to the east through the drainage tile inlet that runs under the East Access Road and outlets into the East Drainage Channel that flows into the Stormwater Pond.

Location: On the east side of the facility between Barns 4 and 3.

Ex. 6 (Personal Privacy)

Facing: Northwest.

Date/Time: 4/28/2021 1:29 p.m.



Photo Number: RIMG0182

Description: The drainage inlet from between Barn 4 and Barn 3.

Location: On the east side of the facility between Barns 4 and 3.

Ex. 6 (Personal Privacy)

Facing: West.

Date/Time: 4/28/2021 1:29 p.m.



Photo Number: RIMG0183

Description: The drainage outlet from between Barn 4 and Barn 3 into the East Drainage Channel east of the East Access Road.

Location: On the east side of the facility between Barn 4 and Barn 3.

Ex. 6 (Personal Privacy)

Facing: East.

Date/Time: 4/28/2021 1:30 p.m.



Photo Number: RIMG0184

Description: The East Drainage Channel on the east side of the facility east of the east access road.

Location: East of the East Access Road.

Ex. 6 (Personal Privacy)

Facing: Northeast.

Date/Time: 4/28/201 1:30 p.m.

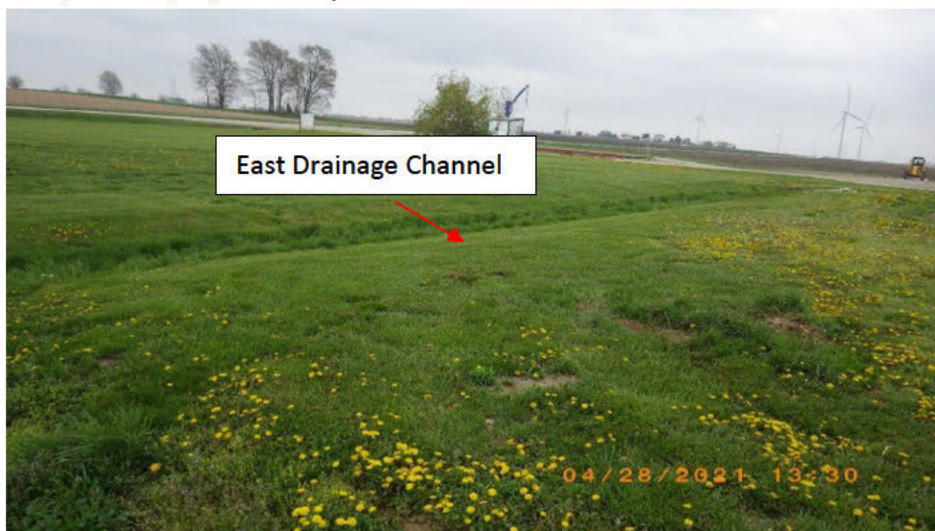


Photo Number: RIMG0185

Description: The East Drainage Channel that collects flow from between the barns.

Location: East of the East Access Road.

Ex. 6 (Personal Privacy)

Facing: Southeast.

Date/Time: 4/28/2021 1:30 p.m.

Benton Dairy, LLC
Ambia, Indiana
Photos taken by Ben Atkinson. Notes for the Photo log taken by Matthew Schulte.
Camera Type: Olympus TG-4



Photo Number: RIMG0186

Description: The drainage outlet conveys the stormwater and process wastewater from what is pushed out of the barns and conveys it under the East Access Road to the East Drainage Channel into the Stormwater Pond.

Location: Southeast corner of the property.

Ex. 6 (Personal Privacy)

Facing: South.

Date/Time: 4/28/2021 1:31 p.m.

Benton Dairy, LLC



Legend

- Hydrography_HighRes_FlowLine_NHD_USGS
- Impaired_Streams_303d_2018_IDEM_IN
- flowlines
- waterbodies
- World Boundaries and Places
- World Imagery
- Low Resolution 15m Imagery
- High Resolution 60cm Imagery
- High Resolution 30cm Imagery
- Citations

0 0.050.1 0.2 Miles

